DOE NEPA REGULATIONS SUBPART D
CATEGORICAL EXCLUSION (CX) DETERMINATION - RFFO/CX10-96

Proposed Action: Process Waste System and Back-Up Fuel System Underground Storage Tank Closures

Location: Buildings 441, 443, 774, 776, and 889, Rocky Flats Environmental Technology Site, Golden, CO

Proposed by: U.S. Department of Energy Rocky Flats Field Office (DOE, RFFO)

Description of the proposed action:

Rocky Flats Field Office proposes to close in place seven underground storage tanks that were a part of the Original Process Waste System and Steam Plant Back-Up Fuel System at the Rocky Flats Environmental Technology Site. These tanks and their associated ancillary equipment were utilized for either waste storage and treatment (the Original Process Waste System) or bulk fuel storage (the Back-Up Fuel System). This equipment is now out of service and is required to be closed.

Closure will be implemented by isolating, draining, cleaning and sealing selected system components (e.g., tanks and ancillary equipment). Isolation techniques include disconnecting and/or removing tank piping, installing blind flanges, and installing lockout/tagout devices on valves. Isolation activities will generate approximately 20 cubic yards of asbestos contaminated waste from the removal of 750 lineal feet of piping. Draining activities include pumping remaining liquids and sludges from the system, followed by either onsite treatment and storage and/or offsite disposal. Cleaning of tank systems, if applicable, is expected to be accomplished by a high-pressure hot water rinse. Draining and cleaning activities will generate approximately 19,000 gallons of an oil/water mixture (Tank #4), 18,000 gallons of low-level waste (Tanks T-2, T-3, and T-40), and 17,400 gallons of TRU mixed waste (Tanks T-10, T-14, and T16). Sealing is accomplished by filling the tanks with an expansive closed cell foam material.

Hazards presented to personnel involved with cleanup will be mitigated by the use of proper personnel protective equipment and safe work practices as directed by OSHA (29 CFR 1910.120) and Site requirements (Health and Safety Practices Manual, Integrated Work Control System, etc.). In addition, a Site Specific Health and Safety Plan is being developed to further ensure the safety of workers performing this project.

Equipment locations and associated functions are as follows: Tanks T-2 and T-3 (south of Building 441), Tanks T-10 (north of Building 776), T-14 and T-16 (east of Building 774), and T-40 (west of Building 889) are components of the Original Process Waste System; Tank #4 (east of Building 443 - Central Steam Plant) was a component of the Steam Plant Back-Up Fuel System. All tanks are located in Operable Units 8, 9, 10 and 13 and their closure is required by the Interagency Agreement. Sealing activities proposed under this project are contained in the Closed Cell Foaming of Underground Structures Proposed Action Memorandum (PAM) planned to receive final regulatory approval in June 1996. This PAM contains requirements for completing the foam filling by September 30, 1996.

Treatment of tank contents, if necessary, will be performed onsite at temporary treatment units at Building 443 (oil/water separation), Building 774 (precipitation), Building 374 (evaporation), or Building 891 (ultraviolet/peroxide and ion exchange). Once treated, the oil/sludge contents of Tank #4 are planned to be shipped to a refinery or sold to an incinerator for use as a fuel blend. Once treated, the contents of Tanks T-2, T-3, T-10, T-14, T-16, and T-40 will remain onsite as either process water or sludges. The sludges generated from treatment of the contents of Tanks T-

10, T-14, and T-16 will be stored onsite in approved storage areas (e.g., Buildings 774 and 776).

The project period of performance is from early 1996 through September 1996. The cost estimate is approximately $1,680,000.

Categorical Exclusion to be applied:

B6.1 Removal actions under CERCLA (including those taken as final response actions and those taken before remedial action) and removal-type actions similar in scope under RCRA and other authorities (including those taken as partial closure actions and those taken before corrective action), including treatment (e.g., incineration), recovery, storage, or disposal of wastes at existing facilities currently handling the type of waste involved in the removal action. These actions will meet the CERCLA regulatory cost and time limits or satisfy either of the two regulatory exemptions from those cost and time limits (National Contingency Plan, 40 CFR part 300). These actions include, but are not limited to: (a) Excavation or consolidation of contaminated soils or materials from drainage channels, retention basins, ponds, and spill areas that are not receiving contaminated surface water or wastewater, if surface water or groundwater would not collect and if such actions would reduce the spread of, or direct contact with, the contamination; (b) Removal of bulk containers (for example, drums, barrels) that contain or may contain hazardous substances, pollutants, contaminants, CERCLA- excluded petroleum or natural gas products, or hazardous wastes (designated in 40 CFR part 261), if such actions would reduce the likelihood of spillage, leakage, fire, explosion, or exposure to humans, animals, or the food chain; (c) Removal of an underground storage tank including its associated piping and underlying containment systems in compliance with RCRA, subtitle I; 40 CFR part 265, subpart J; and 40 CFR part 280, subparts F and G if such action would reduce the likelihood of spillage, leakage, or the spread of, or direct contact with, contamination; (d) Repair or replacement of leaking containers; (e) Capping or other containment of contaminated soils or sludges if the capping or containment would not affect future groundwater remediation and if needed to reduce migration of hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products into soil, groundwater, surface water, or air; (f) Drainage or closing of man-made surface impoundments if needed to maintain the integrity of the structures; (g) Confinement or perimeter protection using dikes, trenches, ditches, or diversions if needed to reduce the spread of, or direct contact with, the contamination; (h) Stabilization, but not expansion, of berms, dikes, impoundments, or caps if needed to maintain integrity of the structures; (i) Drainage controls (for example, run-off or run-on diversion) if needed to reduce offsite migration of hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum or natural gas products or to prevent precipitation or run-off from other sources from entering the release area from other areas; (j) Segregation of wastes that react with one another to result in adverse environmental impacts; (k) Use of chemicals and other materials to neutralize the pH of wastes; (l) Use of chemicals and other materials to retard the spread of the release or to mitigate its effects if the use of such chemicals would reduce the spread of, or direct contact with, the contamination; (m) Installation and operation of gas ventilation systems in soil to remove methane or petroleum vapors without any toxic or radioactive co-contaminants if appropriate filtration or gas treatment is in place; (n) Installation of fences, warning signs, or other security or site control precautions if humans or animals have access to the release; and (o) Provision of an alternative water supply that would not create new water sources if necessary immediately to reduce exposure to contaminated household or industrial use water and continuing until such time as local authorities can satisfy the need for a permanent remedy.

Justification:

The proposed action is a removal-type action authorized under the RCRA tank closure regulations and will meet the CERCLA regulatory cost and time limits or satisfy either of the two regulatory exemptions from those cost and time limits.

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I have determined that the proposed action meets the requirements for a categorical exclusion as defined in Subpart D of 10 CFR 1021. Therefore, I approve the categorical exclusion of the proposed action from further NEPA review and documentation.

Date: 11/10/96

Signature: Regnald W. Tyler

Reginald W. Tyler
RFFO NEPA Compliance Officer